

TROY LAW, PLLC

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October 5, 2022

Via ECF

Hon. Paul A Crotty, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Status Report and Request for Two-Week Extension of Time to File Opening Brief

Pending Receipt of Joanna Lau's Affidavit of Confession of Judgment

18-cv-06174-PAC Chang et al v. CK Tours, Inc et al

Dear Honorable Judge Crotty:

This office represents the Plaintiffs in the above-referenced matter. We write in accordance with Your Honor's Individual Rules at E. to request a two-week extension of time from October 21, 2022 from October 7, 2022. The Defendants' counsel Yongjin Bae consents.

The modified proposed briefing schedule is as follows:

Open: October 14, 2022 (from October 7, 2022)
Opposition (if any): November 11, 2022 (from October 21, 2022)
Reply (if any): November 25, 2022 (from November 4, 2022)

Briefly, since the in-person pre-motion conference before your Honor, John Troy and Tiffany Troy for Plaintiffs have spoken at length with Attorney Yongjin Bae for Defendants about avoiding motion practice to enter a settlement judgment as to Defendant JOANNA LAU. Plaintiffs were informed on Tuesday, October 4, 2022 by Attorney Bae that JOANNA LAU has agreed to sign the Confession of Judgment. Today, I spoke with counselor Bae over the phone to inquire whether it would be likely for our office to receive the signed affidavit of confession of judgment prior to the motion opening deadline set for October 7, 2022, in which case whether Defendants would be amenable to converting the motion briefing schedule into a due date for the joint fairness letter motion. Mr. Bae indicated that Mr. Hang who speaks Chinese was the one who has spoken with Ms. Lau and that he was unsure as to a date certain for the return of the affidavit.

Thus, I respectfully request a two week extension of time from October 7, 2022 to October 21, 2022 to file the opening brief. This should give Defendants sufficient time to provide the affidavit of confession of judgment. Upon receipt, we will file the joint fairness letter motion in

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lieu of engaging in unnecessary motion practice. Should the Defendant fail to provide the affidavit of confession of judgment by that date, Plaintiffs will then proceed through motion practice.

Thank you for your kind attention to this case.

Respectfully Submitted,

/s/ Tiffany Troy, esq.
Tiffany Troy, esq.
Attorney for Plaintiffs

Cc: all counsel of record *via* ECF

/mh

10/6/2022

A one week extension to the current
briefing schedule is granted. SO
ORDERED.

